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June 1, 2022

VIA ECF

The Honorable Matthew J. Skahill, U.S.M.J. Mitchell H. Cohen Building & U.S. Courthouse 4th & Cooper Streets Courtroom 3C Camden, NJ 08101

Spanish Sports Network, LLC et al. vs. Spanish Football Productions, LLC, et al. Civil Case No.: 1:20-cv-07354-KMW-MJS

Dear Judge Skahill:

We write on behalf of Plaintiffs Spanish Sports Network, LLC et al. ("SSN") and Michael Sciore ("Sciore," collectively with SSN, "Plaintiffs") and jointly with Defendants Spanish Beisbol Productions LLC ("SBP"), William Kulik ("Kulik," collectively with SBP the "Kulik Defendants") and Raymond Devine ("Devine") to request an extension of time to complete fact discovery. The current deadline for fact discovery is June 1, 2022 (ECF Doc No. 58). The parties are requesting an extension of 60 days, i.e. until July 31, 2022.

The parties are actively engaged in settlement negotiations and believe that the additional time will better facilitate these talks and ultimately a resolution to this action.

We thank the Court for its attention to this matter.

LEWIS & LIN LLC

Respectfully submitted:

LEWIS & LIN LLC

Howen Valin

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